South Coast
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Draft Environmental Impact Report (Draft EIR) for the Proposed Arrow Highway Specific Plan (SCH No.: 2017041043)

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to establish land use development policies, standards, and guidelines to support development of 40.9 acres of commercial use, 20.6 acres of public/institutional use, 13 acres of industrial use, 29.1 acres of residential use, and 8.6 acres of open space on 106 acres along a 2.73-mile portion of the Arrow Highway in the southern portion of the City of Glendora (Proposed Project). The Proposed Project is projected to include development of over 1.4 million square feet (SF) (maximum buildout) or 647,810 SF (expected buildout) of nonresidential development, 1,611 dwelling units (DU) (maximum buildout) or 739 DU (expected buildout), and 8.6 acres of open space[1]. The Proposed Project is expected to be developed over time with the horizon year of 2040.

SCAQMD Staff's Air Quality Analysis

Based on a review of the Air Quality Section, SCAQMD staff found that the Air Quality Analysis was based on the "expected buildout scenario" because the Lead Agency determined that "expected buildout estimates represent a more realistic potential scenario based on market assumptions, existing conditions, and other factors[2]." The Lead Agency did not quantify construction emissions because it determined that "the significance of future construction emissions cannot be determined at this time[3]." However, the Lead Agency found that "with implementation of existing regulations, future projects within the proposed Specific Plan Planning Area will not result in exceedances of short-term construction-related criteria pollutant emissions thresholds. Impacts from construction will be less than significant[4]."

The Lead Agency quantified the Proposed Project's operational air quality emissions based on the excepted buildout scenario and compared the emissions to SCAQMD's regional air quality CEQA significance thresholds for operation. After incorporating Mitigation Measure AQ-1[5], which requires implementation of transportation demand management (TDM) strategies included in SCAG's 2012 RTP/SCS, the Lead Agency found that the Proposed Project's mitigated net operational emissions would exceed SCAQMD's regional CEQA significance thresholds for VOC and NOx emissions[6]. The Lead Agency also quantified the Proposed Project's net operational emissions based on the maximum buildout

1 Draft EIR. Page 3-4.
2 *Ibid*. Page 2-1.
3 *Ibid*. Page 4.2-22.
4 *Ibid*. Page 4.2-19.
5 *Ibid*. Page 4.2-21.
6 *Ibid.* Table 4.2-5. Page 4.2-20.

scenario for a disclosure purpose, and found that those emissions would exceed SCAQMD's regional CEQA significance thresholds for VOC, NOx, CO, PM10, and PM2.5 emissions[7].

SCAQMD's 2016 Air Quality Management Plan

On March 3, 2017, the SCAQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP)[8], which was later approved by the California Air Resources Board on March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NOx) emissions in 2023 and an additional 55 percent NOx reduction beyond 2031 levels for ozone attainment.

General Comments

SCAQMD staff has reviewed the Air Quality Analysis in the Draft EIR and is concerned about the methodology. Please see the attachment for more information. Additionally, as described in the 2016 AQMP, to achieve NOx emissions reductions in a timely manner is critical to attaining the National Ambient Air Quality Standard (NAAQS) for ozone before the 2023 and 2031 deadlines. SCAQMD is committed to attain the ozone NAAQS as expeditiously as practicable. The Proposed Project plays an important role in contributing to NOx emissions. Therefore, SCAQMD staff has comments on air quality mitigation measure and recommends additional mitigation measures to further reduce NOx emissions as well as ROG, PM10, and PM2.5 emissions. Finally, the attachment includes recommendations to include discussions on SCAQMD rules and regulations.

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful or useful to decision makers and to the public who are interested in the Proposed Project. Further, when the Lead Agency makes the finding that the recommended mitigation measures are not feasible, the Lead Agency should describe the specific reasons for rejecting them in the Final EIR (CEQA Guidelines Section 15091).

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact me at lsun@aqmd.gov if you have any questions regarding the enclosed comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
LS
LAC180119-01
Control Number

[7] *Ibid*. Table 4.2-6.

[8] South Coast Air Quality Management District. March 3, 2017. *2016 Air Quality Management Plan*. Accessed at: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan.

ATTACHMENT

Air Quality Analysis – General

1. As described in the Project Description, the Lead Agency identified two buildout scenarios for the horizon year of 2040: "expected" and "maximum." Since "the expected buildout estimates represent a more realistic potential scenario based on market assumptions, existing conditions, and other factors," the environmental analysis in the Draft EIR was based on the expected buildout scenario[9]. SCAQMD staff is concerned about using the expected buildout scenario to analyze the Proposed Project's environmental impacts, particularly the air quality impacts.

   Under the expected buildout scenario, the Proposed Project's mitigated net operational air quality impacts would be significant only for VOC and NOx emissions (Table 4.2-5 in the Draft EIR). However, under the maximum buildout scenario, the Proposed Project's mitigated net operational air quality impacts would be significant for ROG, NOX, PM10, and PM2.5 (Table 4.2-6 in the Draft EIR. Since the emissions under the maximum buildout scenario were included in the Draft EIR for disclosure purpose only and were not used for determining the level of significance, it may have foreclosed the range of potential feasible alternatives and air quality mitigation measures evaluated in the Draft EIR. To disclose a worst-case operational impact scenario in the Final EIR, SCAQMD staff recommends that the Lead Agency uses the maximum buildout scenario to determine the level of significance for the Proposed Project's operational impacts, *unless the Lead Agency includes requirements and/or conditions, documented in the Final EIR, to ensure that future development under the Proposed Project's maximum development scenario will not occur*.

Air Quality Analysis – Construction Impact Analysis

2. When specific development is reasonably foreseeable as a result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated.

   As shown in Table 3-1 and Table 3-2 in the Draft EIR, the Lead Agency has identified the expected and maximum development scenarios in terms of zoning designations, area in acreage, non-residential area in square feet, number of employees, number of dwelling units, and anticipated population. Therefore, the Lead Agency should use this information and its best efforts to identify construction activities that would be required to implement the expected and maximum development scenarios and quantify associated construction emissions, including emissions from any demolition activities. Otherwise, there is no substantial evidence to support the Lead Agency's finding that the Proposed Project's construction impacts would be less than significant[10].

   Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). SCAQMD staff recommends that the Lead Agency quantify the Proposed Project's construction emissions and compare those emissions to SCAQMD's regional air quality CEQA significance thresholds for *construction* to determine the level

[9] Draft EIR. Page 2-1.
[10] *Ibid*. Page 4.2-19.

of significance. The Lead Agency should use the current version of California Emission Estimator Model (CalEEMod)[11] to quantify construction emissions.

Air Quality Analysis – Interim Milestone Years

3. SCAQMD staff recommends that the Lead Agency include interim milestones years when analyzing construction impacts from the Proposed Project. The buildout year for the Proposed Project is 2040. The overall emission rates of vehicles, trucks, and equipment are generally higher in earlier years as more stringent emission standards and technologies have not been fully implemented and fleets have not fully turned over. It is also likely that the Proposed Project may not be at peak capacity in earlier years, and peak daily emissions may occur in a few years after the project is implemented. Therefore, SCAQMD staff recommends that the Lead Agency include interim milestone years (i.e., year 2020, year 2025, year 2030, and year 2035) in the Air Quality Analysis to ensure the peak daily emissions are identified and adequately disclosed in the Final EIR. The interim milestone years, which were already used in Appendix F, Urban Water Management Plan Update[12], to the Draft EIR, will also assist in the demonstration of progress overtime from implementing air quality-related mitigation measures and policies included in the Draft EIR.

Air Quality Analysis – Localized Significance Thresholds Analysis

4. Based on the information in the environmental settings and a review of aerial maps, SCAQMD staff found that the Proposed Project is potentially surrounded by sensitive receptors. Therefore, SCAQMD staff recommends that the Lead Agency use its best efforts to evaluate localized air quality impacts to disclose the potential impacts on nearby sensitive receptors from construction activities that will occur in close proximity. The SCAQMD's guidance for performing a localized air quality analysis can be found at the SCAQMD website[13]. In the event that the Lead Agency finds, after the analysis, that the Proposed Project would exceed SCAQMD's localized air quality CEQA significance thresholds, mitigation measures are required pursuant to CEQA Guidelines Section 15126.4.

Air Quality Analysis – Overlapping Construction and Operational Activities

5. In the Draft EIR, the Lead Agency stated that the Proposed Project "would accommodate new residential and commercial uses that will operate up to and likely through the Specific Plan horizon year of 2040[14]." However, the Lead Agency did not analyze a scenario where construction activities overlap with operational activities. Since implementation of the Proposed Project is expected to take place over time, an overlapping construction and operation scenario is reasonably foreseeable, unless the Lead Agency includes requirements and/or conditions in the Final EIR that will prohibit overlapping construction and operational activities. Therefore, to analyze a worst-case impact scenario that is reasonably foreseeable at the time the Draft EIR is prepared, SCAQMD staff recommends that the Lead Agency identify the overlapping years, combine construction emissions (including emissions from demolition) with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR. In the event that the Lead Agency, after revising the Air Quality analysis, finds that the Proposed Project's air quality impacts would be significant, mitigation measures will be required pursuant to CEQA Guidelines Section 15126.4. For more information on

[11] South Coast Air Quality Management District. CalEEMod Version 2016.3.2. Accessed at: http://www.aqmd.gov/caleemod/download-model.
[12] Draft EIR. Appendix F. Pages 7-9 to 7-10.
[13] South Coast Air Quality Management District. Localized Significance Thresholds. Accessed at: http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/localized-significance-thresholds.
[14] *Ibid*. Page 4.2-19.

potential mitigation measures as guidance to the Lead Agency, please see Comment No. 10 and visit SCAQMD's CEQA Air Quality Handbook website[15].

Air Quality Analysis – Health Risk Assessment (HRA) Analysis

6. In the Draft EIR, the Lead Agency stated that industrial uses exist in places within the Planning Area of the Proposed Project[16]. The Lead Agency also stated that "actual levels of risk can only be determined through site-specific analysis and specialized air pollutant modeling, based on an actual relationship between an industrial emission source and a specific residential site. Such assessments might determine that there are less than significant health risks, or that there could be some significant level of exposure to pollutants that need to be mitigated through siting, site design, or operational restrictions.[17]" Subsequently, the Lead Agency concluded that potential health impacts from the Proposed Project due to exposure to toxic air contaminants will be less than significant because the Proposed Project would implement General Plan policies, which require proposed developments to prepare an air quality analysis, and existing regulations that regulate and monitor toxic emitters[18].

   SCAQMD staff is concerned that the Proposed Project's health impacts were not analyzed in the Draft EIR, and yet the Lead Agency concluded that the Proposed Project's health impacts will be less than significant. One of the basic CEQA policies is to inform government decision makers and the public about the potential significant environmental effects of proposed activities (CEQA Guidelines Section 15002(a)(1)). A finding that the Proposed Project's health impacts are less than significant is appropriate if the finding is supported by substantial evidence in the record. Here, the Lead Agency has not conducted the HRA analysis, and there is no quantitative or qualitative analysis on how General Plan polices and existing regulations will reduce health impacts to less than significant. As such, there is no substantial evidence in the record to support the Lead Agency's conclusion that the Proposed Project's health impacts will be less than significance. SCAQMD staff recommends that the Lead Agency use its best efforts to conduct a HRA analysis[19] to disclose potential health impacts due to exposures to toxic air contaminants in the Final EIR.

   Information about the Proposed Project that is needed for conducting a HRA analysis is already available in the Draft EIR. "CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does not pass upon the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document" (CEQA Guidelines Section 15003(i)). Preparing the CEQA analysis "necessarily involves some degree of forecasting. While foreseeing the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can" (CEQA Guideline Section 15144). In Section 3.0, *Project Description*, in the Draft EIR, the Lead Agency identified the expected and maximum development scenarios in terms of zoning designations, area in acreage, non-residential area in square feet, number of employees, number of dwelling units, and anticipated population. Also shown in Exhibits 3-4, 3-7, 3-8, 3-9, 3-10, and 3.11 were the urban design framework, proposed land uses, two development districts, mobility plan, and greenway trails for the Proposed Project. Therefore, there is sufficient information with regard to the Proposed

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15 South Coast Air Quality Management District. Accessed at: http://www.aqmd.gov/home/regulations/ceqa.
16 Draft EIR. Page 4.2-24.
17 *Ibid.*
18 *Ibid.*
19 South Coast Air Quality Management District. *Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*. Accessed at: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis.

Project's development kind, size, intensity, and location that the Lead Agency can and should use for conducting a HRA analysis in the Final EIR[20].

Air Quality Analysis – Inconsistent Conclusions

7. After a review of the conclusions for Impact 4.2.B and Impact 4.2.C on Page 4.2-21 and Page 4.2-22, respectively, SCAQMD staff found that they were inconsistent with the conclusion on Page 4.2-25. For Impact 4.2.B and Impact 4.2.C, the Lead Agency had the same conclusions, stating "with implementation of Mitigation Measure AQ-1 and adherence to the City's standard CEQA review process, *impacts will be less than significant*." (*Emphasis added*). When the Lead Agency discussed the level of significance after incorporating Mitigation Measure AQ-1 for Impact 4.2.B and Impact 4.2.C on Page 4.2-25, the Lead Agency stated that "Impacts 4.2.B and 4.2.C would *remain significant and unavoidable* with adherence to existing regulation and implementation of Mitigation Measures AQ-1." (*Emphasis added*). Therefore, SCAQMD staff recommends that the Lead Agency correct the inconsistent conclusions in the Final EIR.

Recommended Changes to Existing Mitigation Measure AQ-1

8. The Lead Agency proposed to incorporate Mitigation Measure AQ-1 to reduce the Proposed Project's operational air quality impacts. As shown in Table 1, Mitigation Measure AQ-1 requires implementation of nine transportation demand management (TDM) strategies included in SCAG's 2012 RTP/SCS[21].

Table 1: Mitigation Measure AQ-1 for the Proposed Project

	TDM Strategies in Mitigation Measure AQ-1
1	Secure bicycle parking (racks, lockers, or bike station)
2	Showers and lockers
3	Site design that facilitates transit use, walking, and cycling. This includes transit stops, bike and pedestrian pathways, landscaping, benches and awnings, lighting, etc.
4	Off-site amenities such as sidewalk improvements, bike network improvements, transit station improvements, improved transit service, transit shelters, roadway and streetscape improvements, intersection improvements, etc.
5	On-site amenities that reduce the need to drive by requiring or encouraging a mix of uses (cafes, drug stores, groceries, banks, post office, services, gyms and childcare) into major developments so workers don't need to use cars during the day.
6	Parking maximums
7	Unbundled parking
8	Priority parking for HOVs
9	Market rate parking

SOURCE: Draft EIR. Page 4.2-25.

SCAQMD staff is concerned about Mitigation Measure AQ-1. First, it is not clear what assumptions and criteria that the Lead Agency used for quantifying emission reductions from implementing this Mitigation Measure. Second, Mitigation Measure AQ-1 lacks specific details. For example, for TDM strategies 1 and 2, there are no specific details about where and how many bicycle parking (racks, lockers, or bike station), showers, and lockers will be implemented within the Proposed Project's Planning Area. Another example is TDM strategy 6 – what is the maximum parking for the Proposed Project's Planning Area or what criteria (e.g., square footage or floor area ratio) will the Lead Agency will to determine parking maximums.

[20] SCAQMD has developed the CEQA significance threshold of 10 in one million for cancer risk. When SCAQMD acts as the Lead Agency, SCAQMD staff conducts a HRA, compares the maximum cancer risk to the threshold of 10 in one million to determine the level of significance for health risk impacts, and identifies mitigation measures if the risk is found to be significant.

[21] Draft EIR. Page 4.2-21 and 4.2-25.

In general, formulation of mitigation measures should not be deferred until some future time. However, in some situations, deferral of the *specific details* of mitigation may be allowable under CEQA when it is impractical or infeasible to fully formulate the details of a mitigation measure at the time of project approval. When deferring specifics of mitigation measures, the Lead Agency should specify performance standards which would mitigate the significant effect of the project (CEQA Guidelines Section 15126.4). Deferral of mitigation details may be improper where performance standards are not specified, and Lead Agency does not provide an explanation for why such standards are impractical or infeasible to provide at the time of certification of the EIR. Since the TDM strategies in Mitigation Measure AQ-1 do not include specific details, the Lead Agency should, at a minimum, develop and incorporate performance standards for each TDM strategies in the Final EIR.

Additional Considerations for Existing Air Quality Policies 3.2, 4.2, and 7.3

9. The Lead Agency proposes to implement applicable City of Glendora General Plan goals and policies to improve air quality through the reduction of total air emissions, education of the public on pollution control measures, and encouraging the best use of available technologies. SCAQMD staff recommends that the Lead Agency incorporate the following considerations before implementing Air Quality Policies 3.2, 4.2, and 7.3 for the Proposed Project.

    a. **Air Quality Policy 3.2** requires "avoidance of placing residential and other sensitive receptors in close proximity to businesses (commercial or industrial) that emit toxic or harmful air contaminants to the greatest extent possible.[22]" In the event that high efficiency or enhanced filtration units are installed at residential and other sensitive receptors to minimize health impacts from exposures to toxic air contaminants such as DPM emissions, SCAQMD staff recommends that the Lead Agency consider their limits and ensure that they are enforceable throughout the lifetime of the Proposed Project. Detailed consideration is italicized as follows:

Limits to High Efficiency or Enhanced Filtration Units

SCAQMD staff recommends that the Lead Agency consider the limitations of the high efficiency or enhanced filtration units. For example, in a study that SCAQMD conducted to investigate filters[23], a cost burden is expected to be within the range of $120 to $240 per year to replace each filter. In addition, because the filters would not have any effectiveness unless the HVAC system is running, there may be increased energy costs to the resident. It is typically assumed that the filters operate 100 percent of the time while residents are indoors, and the analysis in the Draft EIR does not account for the times when the residents have their windows or doors open or are in common space areas of the project. In addition, these filters have no ability to filter out any toxic gases from vehicle exhaust. The presumed effectiveness and feasibility of any filtration units should therefore be evaluated in more detail prior to assuming that they will sufficiently alleviate near roadway exposures to DPM emissions. The evaluation should be included as a mandatory requirement as part of Policy AQ-3.2 or as a new air quality policy in the Final EIR.

Enforceability of High Efficiency or Enhanced Filtration Units

To ensure that high efficiency or enhanced filtration units are enforceable throughout the lifetime of the Proposed Project as well as effective in reducing exposures to DPM emissions, SCAQMD staff

[22] *Ibid*. Page 4.2-14.

[23] This study evaluated filters rated MERV 13+ while the proposed mitigation calls for less effective MERV 12 or better filters. Accessed at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/aqmdpilotstudyfinalreport.pdf. Also see also 2012 Peer Review Journal article by South Coast Air Quality Management District: http://d7.iqair.com/sites/default/files/pdf/Polidori-et-al-2012.pdf.

recommends that the Lead Agency provide additional details on future operational and maintenance implementation and monitoring of filters in the Final EIR. At a minimum, the Final EIR should provide detailed information about the responsible implementing and enforcement agency (or entity); recommended schedules for replacing the high efficiency or enhanced filtration units; ongoing monitoring schedules; ongoing cost sharing strategies, if any, for replacing the high efficiency or enhanced filtration units; disclosure on increased energy costs for running the HVAC system to prospective residents; criteria for assessing progress in installing and replacing the enhanced filtration units; and process for evaluating the effectiveness of the enhanced filtration units. Enforceability should be made a mandatory requirement as part of Policy AQ-3.2 or as a new air quality policy in the Final EIR.

b. **Air Quality Policy 4.2** requires that sensitive receptors are separated, buffered, and protected from significant sources of pollution to the greatest extent possible[24]. SCAQMD staff recommends that the Lead Agency consider the guidance regarding residence sited near a high-volume freeway or other sources of air pollution. Detailed consideration is italicized as follows:

Guidance Regarding Residences Sited Near a High-Volume Freeway or Other Sources of Air Pollution

SCAQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and the SCAQMD to reduce community exposure to source-specific and cumulative air pollution impacts, the SCAQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. SCAQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on SCAQMD's website at: http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's (CARB) Air Quality and Land Use Handbook: A Community Health Perspective, which can be found at: http://www.arb.ca.gov/ch/handbook.pdf.

c. **Air Quality Policy 7.3** supports the SCAQMD's efforts to require stationary air pollution sources, such as gasoline stations, restaurants with charbroilers and deep fat fryers, to comply with and exceed applicable SCAQMD rules and control measures[25]. Detailed consideration is italicized as follows:

SCAQMD Permits

If any subsequent development or activities implemented under the Proposed Project require a permit from SCAQMD, SCAQMD is a Responsible Agency. For more information on permits, please visit SCAQMD webpage at: http://www.aqmd.gov/home/permits. Questions on permits can be directed to SCAQMD's Engineering and Permitting staff at (909) 396-3385.

[24] Draft EIR. Page 4.2-15.
[25] *Ibid*. Page 4.2-16.

Additional Recommended Mitigation Measures

10. CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. SCAQMD staff recommends that the Lead Agency incorporate the following mitigation measures in the Final EIR to further reduce emissions, particularly from NOx, VOC, and particulate matters. Additional information on potential mitigation measures as guidance to the Lead Agency is available on the SCAQMD CEQA Air Quality Handbook website.

    a) Require all off-road diesel-powered construction equipment meet or exceed Tier 4 off-road emissions standards. A copy of the fleet's tier compliance documentation, and CARB or SCAQMD operating permit shall be provided to the Lead Agency at the time of mobilization of each applicable unit of equipment. In the event that all construction equipment cannot meet the Tier 4 engine certification, the Lead Agency must demonstrate through future study with written findings supported by substantial evidence before using other technologies/strategies. Alternative strategies may include, but would not be limited to, reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of individual construction project phases occurring simultaneously.

    b) Require the use of 2010 model year diesel haul trucks that conform to 2010 EPA truck standards or newer diesel haul trucks (e.g., material delivery trucks and soil import/export) during construction and operation, and if the Lead Agency determines that 2010 model year or newer diesel haul trucks are not feasible, the Lead Agency shall use trucks that meet EPA 2007 model year NOx emissions requirements, at a minimum.

    c) Require that 240-Volt electrical outlets or Level 2 chargers be installed in parking lots that would enable charging of NEVs and/or battery powered vehicles.

        Vehicles that can operate at least partially on electricity have the ability to substantially reduce the significant NOx and ROG impacts from this project. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, SCAQMD staff recommends the Lead Agency require the Proposed Project be constructed with the appropriate infrastructure to facilitate sufficient electric charging for vehicles to plug-in.

    d) Maximize use of solar energy including solar panels; installing the maximum possible number of solar energy arrays on the building roofs and/or on the Project site to generate solar energy for the facility.

    e) Limit parking supply and unbundle parking costs.

    f) Maximize the planting of trees in landscaping and parking lots.

    g) Use light colored paving and roofing materials.

    h) Install light colored "cool" roofs and cool pavements.

    i) Require use of electric or alternatively fueled sweepers with HEPA filters.

    j) Require use of electric lawn mowers and leaf blowers.

k) Utilize only Energy Star heating, cooling, and lighting devices, and appliances.

l) Use of water-based or low VOC cleaning products.

To further reduce particulate matter from the Proposed Project, SCAQMD staff recommends that the Lead Agency include the following mitigation measures in the Final EIR.

a) Suspend all soil disturbance activities when winds exceed 25 mph as instantaneous gusts or when visible plumes emanate from the site and stabilize all disturbed areas.

b) Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.

c) Sweep all streets at least once a day using SCAQMD Rule 1186, 1186.1 certified street sweepers or roadway washing trucks if visible soil materials are carried to adjacent streets (recommend water sweepers with reclaimed water).

d) Apply water three times daily, or non-toxic soil stabilizers according to manufacturers' specifications, to all unpaved parking or staging areas, unpaved road surfaces, or to areas where soil is disturbed.

Compliance with SCAQMD Rule 403, Rule 403(e), and Rule 1113

11. The Lead Agency discussed that the Proposed Project is subject to SDCAPCD Rule 55 regulating fugitive dust[26]. Since the Proposed Project, in its entirety, is located within SCAQMD, the Proposed Project is subject to SCAQMD rule regulating fugitive dust. Therefore, the Lead Agency should include a discussion to demonstrate how the Proposed Project will comply with SCAQMD Rule 403[27], Fugitive Dust, in the Final EIR. Compliance with SCAQMD Rule 403 will reduce particulate matters from the Proposed Project

12. In addition to the discussion on general compliance with SCAQMD Rule 403 in the Final EIR, and since the Proposed Project is a large operation of approximately 106 acres (50-acre sites or more of disturbed surface area; or daily earth-moving operations of 3,850 cubic yards or more on three days in any year) in the South Coast Air Basin. The Lead Agency is required to comply with SCAQMD Rule 403(e) – Additional Requirements for Large Operations[28], which includes requirements to provide Large Operation Notification Form 403 N, appropriate signage, additional dust control measures, and employment of a dust control supervisor that has successfully completed the Dust Control in the South Coast Air Basin training class[29]. Therefore, SCAQMD recommends that the Lead Agency include a discussion to demonstrate specific compliance with SCAQMD Rule 403(e) in the Final EIR. Compliance with SCAQMD Rule 403(e) will further reduce particulate matters from the Proposed Project.

13. The Lead Agency discussed that the Proposed Project is subject to SDCAPCD Rule 67.0.1 regulating VOC content of architectural coating[30]. Since the Proposed Project, in its entirety, is located within

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26 *Ibid.* Page 4.2-19.

27 South Coast Air Quality Management District Rule 403. Last amended June 3, 2005. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/rule-iv/rule-403.pdf.

28 *Ibid.*

29 South Coast Air Quality Management District Compliance and Enforcement Staff's contact information for Rule 403(e) Large Operations is (909) 396-2608 or by e-mail at dustcontrol@aqmd.gov.

30 Draft EIR. Page 4.2-19.

SCAQMD, the Proposed Project is subject to SCAQMD rule regulating architectural coating. Therefore, the Lead Agency should include a discussion to demonstrate how the Proposed Project will comply with SCAQMD Rule 1113[31], Architectural Coating, in the Final EIR. Compliance with SCAQMD Rule 403 will reduce VOC emissions from the Proposed Project.

Other Comment

14. According to the Notice of Availability (Notice) for the Proposed Project, the Draft EIR is available for a 45-day public review and comment period beginning Thursday, January 18, 2018 and ending *Monday, March 5, 2018*. (*Emphasis added*). However, the Notice also says that "any persons wishing to comment on the Draft EIR may provide written comments […] *by Monday February 26, 2018*." (*Emphasis added*). Pursuant to CEQA Guidelines Section 15087, the notice of availability of a Draft EIR should include, among others, the starting and ending dates for the review period during which the lead agency will receive comments. Since there are two publicly noticed comment ending dates, the Lead Agency should correct the comment ending date in the Notice.

[31] South Coast Air Quality Management District Rule 1113. Last amended February 5, 2016. Accessed at: http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf.